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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13
14 LORELEI CRESCINI, } Case No.: CV 11-02328 EJD
15 Plaintiff, } STIPULATION AND PROPOSED
16 v. } ORDER FOR DISMISSAL WITH
17 Defendants. } PREJUDICE OF ENTIRE ACTION
18 }

19 Counsel for the parties, Plaintiff Lorelei Crescini and Defendant Standard
20 Insurance Company (“Standard”), jointly and respectfully submit this Stipulation
21 and Order for Dismissal with Prejudice of this entire action, following settlement
22 of this matter on terms that are confidential.

23 More specifically, each and all of the parties hereto, by and through their
24 respective undersigned counsel, stipulate to the dismissal of this entire action with
25 prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(ii), each party to
26 bear her or its own costs, expenses and attorney fees. The parties further stipulate
27 that this Court shall retain continuing jurisdiction over any dispute arising out of

1 the settlement of this matter. *The parties add that there is no dispute currently and*
2 *none is anticipated.*

3 Local Civil Rule 7-12, Stipulations, provides:

4 Every stipulation requesting judicial action must be in writing signed by all
5 affected parties or their counsel. A proposed form of order may be submitted
6 with the stipulation and may consist of an endorsement on the stipulation of
7 the words, "PURSUANT TO STIPULATION, IT IS SO ORDERED," with
8 spaces designated for the date and the signature of the Judge.

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Pursuant to their settlement and the terms of Local Rule 7-12, the parties respectfully request that the Court enter the Order that follows.

So Stipulated:

Dated: September 29, 2011

s/Constantin V. Roboostoff
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Attorneys for Plaintiff
LORELEI CRESCINI

Dated: September 29, 2011

s/Warren H. Nelson, Jr.
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SIGNATURE ATTESTATION

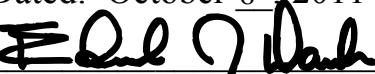
Pursuant to General Order No. 45 § XB, I, Warren H. Nelson, Jr., the e filer of this document, attest that concurrence in the filing of this document has been obtained from the other signatory shown above, Constantin V. Roboostoff, Esq, who is a registered "e filer" with this Court.

Dated: September 29, 2011

s/Warren H. Nelson, Jr.
WARREN H. NELSON, JR. # 104744

PURSUANT TO STIPULATION, IT IS SO ORDERED. The Clerk shall close this file.

Dated: October 6 2011


EDWARD J. DAVILA, JUDGE
UNITED STATES DISTRICT COURT